UNITED STATES DISTRICT COURT DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA,)	
Plaintiff,)	
v. EARL DICKERSON,)))	No. 04-CR-10202-RWZ
Defendant.)))	

ASSENTED-TO MOTION FOR ENTRY OF PROTECTIVE ORDER

The Government, with the assent of counsel for the Defendant, respectfully moves for entry of the protective order attached hereto as Exhibit A (the "Order") for the following reasons:

- 1. The Government has received additional discovery concerning former chemist Sonja Farak from the Massachusetts Attorney General;
- 2. The discovery includes 254 pages of mental health records regarding Ms. Farak, which may relevant to the above-captioned case;
- 3. Due to the sensitive nature of the records, the Order provides that the mental health records will be provided for the attorney's review but not disclosed to the Defendant; and
 - 4. Defense counsel has signed the Order and agrees to it terms.

Wherefore, the government requests that the Court enter the Order in this matter.

Respectfully submitted,

THE UNITED STATES OF AMERICA

By its attorney,

CARMEN M. ORTIZ UNITED STATES ATTORNEY

/s/ Giselle J. Joffre

Giselle J. Joffre (BBO No. 658047) Assistant U. S. Attorney U.S. Attorney's Office John Joseph Moakley Courthouse 1 Courthouse Way, Suite 9200 Boston, MA 02210 Giselle.Joffre@usdoj.gov (617) 748-3100

Dated: December 17, 2015

CERTIFICATE OF SERVICE

I, Assistant U.S. Attorney Giselle J. Joffre, hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non-registered participants.

/s/ Giselle J. Joffre
Giselle J. Joffre

Assistant U.S. Attorney

Dated: December 17, 2015